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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass,

PLAINTIFFS,

vs.

ALAMEDA COUNTY SHERIFF'S OFFICE, et
al
DEFENDANTS.

No. 3:19-cv-07423 JSC

**STIPULATION OF THE PARTIES TO
MODIFY DISCOVERY AND PLEADING
SCHEDULE**

Hon. Jacqueline S. Corley, Presiding

Whereas, County Defendants produced documents potentially responsive to this litigation on February 29, 2024 and March 1, 2024;

Whereas Plaintiffs have been unable to review the entirety of the document production, but from a partial document review, have ascertained that the documents do pertain to the subject matter of this litigation;

Whereas all parties met and conferred in person on March 6, 2024;

Whereas the parties had a settlement conference before Magistrate Judge Laurel Beeler, and settlement negotiations are continuing and the parties have a further conference scheduled for March 14;

Plaintiffs, County defendants, defendant Aramark and defendant Wellpath stipulate as follows, that subject to the Order of the Court the following currently pending dates will be revised.

All pending dates for County defendants, defendant Wellpath, defendant Aramark and plaintiffs shall be continued two weeks as follows:

Events	Current Deadline	Proposed Date
Expert Disclosure Re County Defendants	March 7, 2024	March 21, 2024
Rebuttal Expert Reports Re County Defendants	March 21, 2024	April 4, 2024
Motion for Summary Judgment – Defendant Wellpath & Aramark	March 21, 2024	April 4, 2024
Expert Discovery cutoff	April 4, 2024	April 18, 2024
Opposition to MSJ- Defendant Wellpath & Aramark	April 25, 2024	May 9, 2024
Defendant Wellpath's & Aramark's Reply	May 9, 2024	May 23, 2024
Motion for Summary Judgment-County Defendants	April 11, 2024	April 25, 2024
Opposition to MSJ - County Defendant	May 9, 2024	May 23, 2024
County Defendants' Reply	May 23, 2024	June 6, 2024
Hearing on Wellpath & Aramark MSJ	May 23, 2024	June 13, 2024
Hearing on County Defendants' MSJ	June 13, 2024	June 13, 2024

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2 Defendants' meet and confer focused on continuing deadlines related to the expert discovery
3 deadline by two weeks to permit the parties to review the newly discovered documents. Defendants
4 respectfully ask the Court to continue all deadlines related to the Daubert, motion for summary
5 judgment and motion to decertify the certified class to alternate dates if the parties' proposed dates
6 are not convenient for the Court.

7 Defendant and Plaintiffs stipulate that the parties waive any objection to submission of a
8 supplemental report by the due date of the reply report, based upon the additional documents
9 produced by County defendants.

10 County Defendants do not stipulate nor waive any objections they may have to supplemental
11 reports.

12 The parties have scheduled the following expert depositions:

13 March 11, 2024 - 9:00 a.m. Deposition of Dr. Franco-Paredes

14 March 12, 2024 - 9:00 a.m. Deposition of Dr. Rosenberg

15 1:00 p.m. Deposition of Dr. Feachem

16 March 13, 2024 - 10:00 a.m. Deposition of Dr. McKnight

17 March 14, 2024 - Deposition of Ms. Waukeen

18 The parties agree that all noticed depositions are off calendar, and will be rescheduled within
19 two weeks in the event that settlement negotiations are not successful.

20 IT IS SO STIPULATED:

21 DATED: 3/6/24

LAW OFFICE OF YOLANDA HUANG

22
23 /s/ Yolanda Huang
Yolanda Huang

24 ATTORNEY FOR PLAINTIFFS
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BERTLING LAW GROUP

By: /s/ Peter Bertling

Peter Bertling

Attorneys for Defendant Wellpath Management, Inc.

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Charles J. Reitmeyer

CHARLES J. REITMEYER

Attorneys for Defendant

ARAMARK CORRECTIONAL SERVICES LLC

BURKE WILLIAMS & SORENSEN LLP

By: /s/ Temitayo O. Peters

Temitayo O. Peters

Attorneys for Defendants, County of Alameda, Alameda

County Sheriff's Office, Deputy Joe, and Deputy Ignont

ATTESTATION PER LOCAL RULE 5-1(h)(3)

I, Yolanda Huang, attest that concurrence in the filing of this document has been obtained from the other signatories.

/s/ Yolanda Huang

Yolanda Huang

PROPOSED ORDER

The stipulation of the parties having been submitted, and good cause appearing,

IT IS HEREBY ORDERED that the schedule is hereby amended as follows:

Events	Current Deadline	Proposed Date
Expert Disclosure Re County Defendants	March 7, 2024	March 21, 2024
Rebuttal Expert Reports Re County Defendants	March 21, 2024	April 4, 2024
Motion for Summary Judgment – Defendant Wellpath & Aramark	March 21, 2024	April 4, 2024
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The parties’ noticed depositions below are off calendar and the parties shall reschedule these for new dates in the event that the case does not resolve.

March 11, 2024 - 9:00 a.m. Deposition of Dr. Franco-Paredes

March 12, 2024 - 9:00 a.m. Deposition of Dr. Rosenberg

1:00 p.m. Deposition of Dr. Feachem

March 13, 2024 - 10:00 a.m. Deposition of Dr. McKnight

March 14, 2024 - Deposition of Ms. Waukeen

Dated: _____, 2024

FEDERAL DISTRICT JUDGE